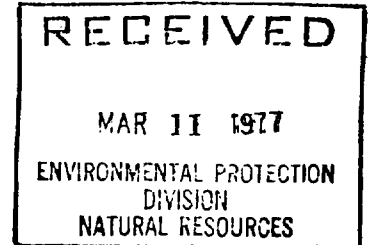


58349

March 10, 1977

Mr. J. Leonard Ledbetter  
Director  
Environmental Protection Division  
Department of Natural Resources  
270 Washington Street, S. W.  
Atlanta, Georgia 30334



Dear Mr. Ledbetter:

Thank you for the opportunity to review our comments on the Rome Plant NPDES Permit with Mr. Welsh and Mr. Jernigan and you. I believe that the meeting produced a worthwhile exchange of ideas and better understanding.

One of the subjects we discussed was whether the decision issued by the EPA on February 2, regarding effluent standards for PCBs under Section 307(a) of the FWPCA was applicable to the Rome Plant's permit or not. I indicated that we would share our understanding of that decision with you.

The decision and regulations issued under Section 307(a) apply only to manufacturers of PCBs and to plants that use PCBs in the manufacture of capacitors and transformers. As you know, the Rome Plant has never manufactured PCBs. Moreover, since the Rome Plant will cease the manufacture of transformers containing Pyranol by June 30, 1977, as publicly announced and, hopefully, even earlier, the regulation is simply not applicable to the Rome Plant nor to the plant's NPDES Permit.

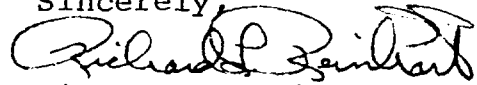
Both the counsel for General Electric's Corporate Environmental Protection Operation in Schenectady, as well as our outside counsel in Atlanta have reviewed the decision and reached the conclusion that the regulations will not apply to the Rome Plant. Our counsel cite as firm evidence of their conclusion, the paragraph beginning at the bottom of page 6550 and continuing on page 6551 in 42 Federal Register No. 22, Wednesday, February 2, 1977.

Mr. J. Leonard Ledbetter      - 2 -      March 10, 1977

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Thank you again for your courtesy in meeting with us last Monday. We look forward to working with you closely in the months ahead.

Sincerely,



Richard L. Reinhart  
Manager  
Transformer and Distribution  
Equipment Relations and  
Utilities Operation  
General Electric Company

RLR:al

cc: Mr. G. B. Welsh  
Mr. W. Jernigan  
Mr. R. Byron Attridge

STATE OF GEORGIA  
DEPARTMENT OF NATURAL RESOURCES

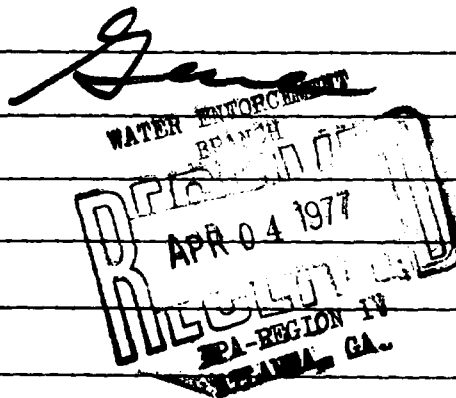
OFFICE MEMORANDUM

Date: 3/28/77 Time: \_\_\_\_\_  
TO: George Harlow  
Enf. Div. EPA  
FROM: JB Wilson

SUSPENSE DATE: \_\_\_\_\_

☒ For your information and/or file  
~~Attached per your request~~  
\_\_\_\_ Please handle  
\_\_\_\_ See or call me about this  
\_\_\_\_ Draft reply for signature of \_\_\_\_\_  
\_\_\_\_ For your approval/signature  
\_\_\_\_ Please furnish me with information  
\_\_\_\_ Review and return

COMMENTS: \_\_\_\_\_  
Thought you might  
be interested -



WATER ENFORCEMENT BRANCH  
ROUTE SLIP

DATE \_\_\_\_\_

FROM: ~~Mr. Harlow~~

TO: \_\_\_\_\_ Patrick  
\_\_\_\_\_ Ruch  
\_\_\_\_\_ Lank  
\_\_\_\_\_ Guinyard  
\_\_\_\_\_ Moebes  
\_\_\_\_\_ Kaplan  
\_\_\_\_\_ Cloward  
\_\_\_\_\_ Wallace  
\_\_\_\_\_ Wooten  
\_\_\_\_\_ Taimi  
\_\_\_\_\_ Cozart  
✓ \_\_\_\_\_ Jennings  
\_\_\_\_\_ Wilson

SUSPENSE DATE \_\_\_\_\_

REMARKS:



Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION

270 WASHINGTON STREET, S.W.  
ATLANTA, GEORGIA 30334

*George Harlow*  
*Env. Division*  
*E.P.A.*